

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (Dayton)**

UNITED STATES OF AMERICA,)	CASE NO. 3:19cr35(2)
)	
Plaintiff,)	Judge Walter H. Rice
)	
v.)	<u>DEFENDANT IMANI FORD'S</u>
)	<u>MOTION TO UNSEAL OR</u>
IMANI FORD,)	<u>OTHERWISE RELEASE COPY</u>
)	<u>OF COMPLAINT</u>
Defendant.)	

Defendant Imani Ford moves the court to unseal and/or release to this Defendant a copy of the Criminal Complaint with all attachments filed in Case Number 3:19-mj-00046-SLO, United States v. Brookes Rhodes. See Doc. 6, 2/1/2019, Case No. 3:19-cr-00035-WHR-1. As grounds for this Motion counsel states that said Complaint is believed to contain factual allegations relevant to this Defendant's defenses, including potentially exculpatory information, and particularly as it relates to allegations made against or involving this Defendant, and also his co-defendant and alleged (but disputed) co-conspirator and now apparently a Government's witness against this Defendant. The allegations in said Complaint apparently having led to the same Indictment and a guilty plea by that Defendant, it also does not appear there are grounds to continue to keep the Complaint from public view.

Wherefore it is requested the Court unseal said Complaint or otherwise provide a copy for this counsel and Defendant's use.

THOMAS G. EAGLE CO., L.P.A.

/s/Thomas G. Eagle
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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2020, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of such filing to the following:
Amy Smith, Assistant U.S. Attorney, U.S. Attorney Office, Federal Building, 200 West Second Street, Suite 600, Dayton, Ohio 45402.

/s/Thomas G. Eagle
Thomas G. Eagle (#0034492)